

## Section 8 – Plan Maintenance

This section of the Plan addresses requirements of Interim Final Rule (IFR) Section 201.4 (c) (5) and (d). A copy of the IFR is provided for reference in **Appendix B** of this document.

### Contents of this Section

- 8.1 Interim Final Rule Requirements for Plan Maintenance Process
- 8.2 Method for Monitoring, Evaluating and Updating the Plan
- 8.3 System for Monitoring Mitigation Measures and Project Closeouts
- 8.4 System for Reviewing Progress on Achieving Goals
- 8.5 System for Reviewing Progress on Activities and Projects in the State Mitigation Strategy

Section	What has been updated?
8.1	<ul style="list-style-type: none"><li>This section was not changed as part of the Plan update process</li></ul>
8.2	<ul style="list-style-type: none"><li>This section was revised to reflect lessons learned regarding the plan maintenance and update process in the last three years</li></ul>
8.3	<ul style="list-style-type: none"><li>This section has been revised to reflect how AEMA currently monitors mitigation projects and closeouts based</li></ul>
8.4	<ul style="list-style-type: none"><li>This section was not changed as part of the Plan update process</li></ul>
8.5	<ul style="list-style-type: none"><li>This section has been revised to reflect the restructured annual plan evaluation process described in <b>Section 8.2</b>.</li></ul>

## **8.1 Interim Final Rule Requirements for Plan Maintenance Process**

The Interim Final Rule (IFR) Subsection 201.4 [c] [5] requires the State Hazard Mitigation Plan to include a section that describes the Plan Maintenance Process.

“(The State Hazard Mitigation Plan shall include a) section on the *A Plan Maintenance Process* that includes:

- (i) An established method and schedule for monitoring, evaluating and updating the plan.
- (ii) A system for monitoring implementation of mitigation measures and project closeouts.
- (iii) A system for reviewing progress on achieving goals as well as activities and projects identified in the mitigation strategy.”

The IFR Subsection 201.4[d] requires the State Hazard Mitigation Plan to be revised and updated every three years.

“The Plan must be reviewed and revised to reflect changes in development, progress in statewide mitigation efforts, and changes in priorities and resubmitted for approval to the appropriate Regional Director every three years. The Regional review will be completed within 45 days after receipt from the State, whenever possible. We also encourage a State to review its plan in the post-disaster timeframe to reflect changing priorities, but it is not required.”

## **8.2 Method for Monitoring, Evaluating and Updating the Plan**

### **8.2.1 Background**

As directed by Executive Order No. 19, the Alabama Emergency Management Agency (AEMA) is responsible for maintaining the State Hazard Mitigation Plan, including all monitoring, evaluation, and update activities.

As part of this plan update process, AEMA reviewed the strategy detailed in the 2004 Plan for monitoring, evaluating, and updating the plan and compared it to the plan maintenance activities that actually occurred since plan adoption in 2004.

The 2004 Plan calls for AEMA to initiate an annual review of the state plan by the State Hazard Mitigation Team (SHMT). Due to Hurricanes Ivan, Dennis, and Katrina, priorities shifted to response and recovery activities, and the annual SHMT plan evaluations did not occur. The SHMT reviewed the mitigation goals, priorities and actions as part of this plan update process, and although the State had endured three major hurricanes and the March 1, 2007 tornadoes, it was determined that the mitigation priorities of the State had not been substantially altered when AEMA initiated the plan update process and the SHMT reconvened in the spring of 2007.

This process has been revised to provide greater flexibility to AEMA and the State of Alabama in their efforts to maintain the plan.

This section of the plan describes the method by which AEMA will accomplish this.

### **8.2.2 Method for Monitoring the Plan**

Regular plan monitoring will be achieved through AEMA's efforts to track mitigation activities. These activities are described in **Sections 8.3** through **8.5** below.

### **8.2.3 System for Evaluating the Plan**

AEMA will conduct an annual evaluation of the plan, generally in the month of November. The evaluation will consider several basic factors including:

1. Changes in the level of risk to the State and its citizens.
2. Changes in laws, policies, or regulations at the State or local levels.
3. Changes in State agencies or their procedures that will affect how mitigation programs or funds are administered.
4. Significant changes in funding sources or capabilities.
5. Changes in the composition of the State Hazard Mitigation Team.
6. Progress on mitigation actions (including project closeouts) and new mitigation actions that the State is considering.
7. Major changes to local or multi-jurisdictional hazard mitigation plans.

Additionally, as described separately in **Section 7.2**, AEMA will contact local Emergency Management Agency (EMA) Directors (and other individuals and organizations as appropriate) to determine if updates have been made to certain elements of the local plans as part of the annual review process. The purpose of this effort is to ensure that local information about risk, goals, projects, and mitigation strategies included in the State Plan remains current.

AEMA will produce a brief summary report of the findings of its review and submit this to the SHMT and the Technical Advisory Committee (TAC). This summary will include a recommendation as to whether the findings of the review are significant enough to warrant an update to the plan. If any party indicates that an update is warranted, then AEMA, in conjunction with the SHMT and the TAC, will initiate the plan update process.

The initial plan also called for AEMA to update the plan after a major disaster declaration. The State of Alabama experienced major disaster declarations with Hurricanes Ivan, Dennis, and Katrina and the tornadoes on March 1, 2007. After all these disasters, AEMA initiated its tri-annual plan update process and determined that priorities remained relatively unchanged. Therefore, instead of updating the plan after a major disaster declaration, AEMA will review the plan to determine if an interim update is warranted.

### **8.2.4 System for Updating the Plan**

The plan will be updated and re-submitted to FEMA for re-approval every three years, as required by law. The plan may also be subject to interim updates if any of the following conditions apply:

1. At the request of the Governor;
2. When significant new risks or vulnerabilities are identified; or
3. If the findings of the annual / post-disaster review and evaluation warrant.

The two sub-paragraphs below describe the procedures for interim and three-year updates, respectively.

### **Updates Resulting from Interim Evaluations**

The nature of plan updates will be determined by the evaluation process described above. In general, AEMA will notify the TAC of the SHMT that the agency is initiating an interim plan update, and describe the circumstances that created the need for the update. AEMA and the TAC will determine if the full SHMT should be consulted regarding the potential changes. If it is determined that the SHMT should be involved, the nature of the involvement will be at the discretion of AEMA and the TAC.

When interim updates are completed, AEMA will advise all SHMT members that the plan has been updated, and describe the nature of the update.

### **Updates Related to the Required Three-year Plan Review (by FEMA)**

As required by law, every three years the plan will be updated for re-submission and re-approval by FEMA. In those years, the evaluation process will be substantially more rigorous, and will examine all aspects of the plan in detail. It is anticipated that several meetings of the SHMT will be required, and that the plan will be formally readopted by the State. Based on the October 17, 2007 deadline for this plan update, AEMA anticipates that the submission date for the next plan update will be October 2010. Between 6 and 12 months prior to October 2010, AEMA will initiate the plan update process by contacting SHMT members and other appropriate agencies and organizations to determine a schedule and process for updating the plan.

The update process will entail a detailed and structured re-examination of all aspects of the original plan, followed by recommended updates. The recommendations will be presented to the SHMT for consideration and approval. It is expected that the Director of AEMA will re-approval the plan and adopt it on behalf of the Governor.

## **8.3 System for Monitoring Mitigation Measures and Project Closeouts**

As described in the HMGP Administrative Plan, AEMA uses the following system for monitoring mitigation measures and project closeouts.

### **8.3.1 Monitoring Mitigation Measures**

Mitigation projects are generally monitored as follows.

- Each mitigation project or activity (such as planning) has an established period of performance that AEMA and FEMA monitor throughout the development and execution of the activity.

- AEMA conducts kick-off meetings for newly approved grants in cases where the subgrantee does not have much grant administration experience, or upon request, to discuss grant administration procedures and process to request reimbursement
- AEMA regularly meets with representatives from FEMA Region IV to coordinate project monitoring activities.
- Every calendar quarter, AEMA sends letters to all subgrantees with open projects (i.e. ones that have been funded but are not completed), requesting a project progress update.
- Each of the subgrantees responds to AEMA request by preparing a standard report that details progress on individual mitigation projects, and indicates percent complete.
- AEMA performs quarterly site visits on all open mitigation projects.
- AEMA compiles the subgrantee progress reports, and produces a consolidated quarterly report that is sent to FEMA Region IV for review.

### **8.3.2 Monitoring Project Closeouts**

Mitigation project closeouts occur in the following sequence. These procedures were established in accordance with FEMA HMGP guidelines as set out in the HMGP Desk Reference and the State of Alabama HMGP Administrative Plan.

- Subgrantee indicates in a quarterly project progress report that a mitigation project is 100 percent complete.
- AEMA reconciles FEMA SmartLink account for the project (by disaster).
- AEMA initiates an internal financial audit of the project.
- AEMA resolves any issues discovered in the audit.
- AEMA sends FEMA Region IV a closeout letter that delineates the final eligible cost of the project, and delineates any de-obligations that are required, as well as any monies that will be recovered from the subgrantee.

## **8.4 System for Reviewing Progress on Achieving Goals**

In order to track progress on achieving the goals identified in this plan, AEMA will ensure that both the annual and three-year plan evaluations include a review and analysis of the goals, and the various actions that are intended to achieve them. This process will be substantially more rigorous and detailed during the formal plan update process. **Section 6** of the plan describes six hazard mitigation goals, and includes a detailed table that lists various strategies and actions that the State is undertaking or considering to address the goals. As part of this plan update, this table has been modified to include a column indicating the status of the various actions and a general indication of progress.

The system for reviewing progress on achieving goals will remain the same as it has proved successful over the last three years.

## **8.5 System for Reviewing Progress on Activities and Projects in the State Mitigation Strategy**

As part of the annual evaluation, AEMA will conduct a preliminary review and analysis of progress on activities listed in the mitigation strategy section. The results of this review will be included in brief summary report submitted to the TAC and the SHMT.

As part of the three-year update to the plan, AEMA will initiate a more detailed review and evaluation of all activities and projects noted in the mitigation strategy. AEMA will report its findings to the SHMT at meetings held as part of the plan update process. The results of these findings will be included in the table of mitigation goals and actions included in **Section 6**. If requested by FEMA, AEMA will prepare a summary report describing the results of the review.